

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

vs.

MOZILLA CORPORATION, a.k.a. M.F.  
Technologies, a California corporation ;  
MOZILLA FOUNDATION, a California  
public benefit corporation; LAURA  
CHAMBERS and her marital community;  
WINIFRED MITCHELL BAKER and her  
marital community; and DANI CHEHAK and  
her marital community;

Defendants.

Case No. 2:24-CV-01032-RAJ

**DEFENDANT MOZILLA  
FOUNDATION'S NOTICE OF JOINDER  
IN DEFENDANTS MOZILLA  
CORPORATION, *ET AL.*'S MOTION TO  
CONTINUE TRIAL DATE AND AMEND  
CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:  
MAY 16, 2025**

Defendant Mozilla Foundation ("the Foundation"), by and through its undersigned counsel, joins Defendants Mozilla Corporation, Laura Chambers, and Dani Chehak's ("the Corporation") Motion to Continue Trial Date and Amend Case Schedule, filed on April 25, 2025. Dkt. # 40. The Foundation incorporates by reference all of the arguments contained therein.

In addition to the reasons offered by the Corporation, the Foundation highlights that thousands of pages of discovery documents were produced in the last two weeks with additional discovery documents both anticipated and subject to pending motions. The current deposition schedule is unworkable and unrealistic given the likelihood of the last-minute production of necessary documents, which will result in prejudice to the parties in preparing for depositions and summary judgment. For these reasons, and the reasons stated in the Corporation's Motion and

Defendant Winifred Mitchell Baker's Notice of Joinder, Dkt. # 43, the Foundation respectfully requests that the Court grant the Motion to Continue Trial Date and Amend Case Schedule.

DATED this 1st day of May, 2025.

SEBRIS BUSTO JAMES

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Attorneys for Defendant Mozilla Foundation

I certify that this memorandum contains 160 words, in compliance with the Local Civil Rules.

**CERTIFICATE OF SERVICE**

I, Darren A. Feider, certify under penalty of perjury under the laws of the United States and the State of Washington that, on May 1, 2025, I caused to be served the attached document to the individual listed below in the manner shown next to his name:

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/s/Darren A. Feider

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